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RE: *John Fairchild and Susie Fairchild, et al. v. Coryell County, Texas, et al.*;
Civil Action No. 6:19-cv-00029; In the United States District Court for the
Western District of Texas, Waco Division.

Dear Counsel:

As you know, Phase 2 discovery is beginning. Since the court has not ruled on summary judgment motions on the issue of qualified immunity, I left a voicemail message for Cass asking whether Defendants were interested in filing a motion extending certain time periods in the existing scheduling order. I did not receive a response and assume the Defendants intend to comply with dates in this current scheduling order.

Therefore, please forward to me all documents and responsive items which your clients did not produce in response to Plaintiffs' written discovery requests, due to the requests allegedly seeking responsive items related to issues other than qualified immunity. I would appreciate prompt supplementation, as I intend to take the County's deposition on *Monell* issues as well as possibly other depositions. I need responsive items to prepare for those depositions. I look forward to hearing from you.

Sincerely,


T. Dean Malone

TDM/cmr